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7 Attorneys for Plaintiffs

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 D.S., a minor by and through his
13 guardian *ad litem* Elsa Acosta,
14 individually and as successor-in-
15 interest to William Salgado, et.al.

16 Plaintiffs,

17 v.

18 CITY OF HUNTINGTON PARK; et.al.

20 Defendants

22 AND CONSOLIDATED ACTION

) Case No. 2:23-cv-09412 CBM (AGR) [*lead*
case]
) (*Consolidated with 2:24-cv-04898 CBM*
) (*AGR*)

) *Assigned to:*

) District Judge: Consuelo B. Marshall
)) Magistrate Judge: Alicia G. Rosenberg
))

) **DECLARATION OF KENT M.**
)) **HENDERSON IN SUPPORT OF**
)) **PLAINTIFFS' OPPOSITION TO**
)) **DEFENDANTS' MOTION FOR**
)) **SUMMARY JUDGMENT AND**
)) **EXHIBITS THERETO**

) [Plaintiffs' Memorandum of Points and
)) Authorities and Separate Statement of
)) Disputed and Undisputed Material facts filed
)) concurrently herewith]
))

) Date: April 1, 2025
)) Time: 10:00 a.m.
)) Courtroom: 8D

1 **TO THE HONORABLE COURT, DEFENDANTS, AND TO THEIR**
2 **ATTORNEYS OF RECORD HEREIN:**

3 PLEASE TAKE NOTICE that Plaintiffs, WILLIAM OMAR CASTILLO
4 MIRANDA; JUANA MARIA MIRANDA; O.C.E. a minor by and through their
5 Guardian ad Litem, EUGENIA GUADELUPE ESPINOZA SALMERON;
6 EUGENIA GUADELUPE ESPINOZA SALMERON, OSMAR ANTONIO
7 CASTILLO BLANDON, and KARLA VANESSA BLANDON hereby submit the
8 Declaration of Kent M. Henderson in support of Plaintiffs' Opposition to
9 Defendants' Motion for Summary Judgement, or in the alternative Partial
10 Summary Judgment and Exhibits Thereto.

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12
13 DATED: March 11, 2025

14 **CARRAZCO LAW, A.P.C.**

15 */S/ Kent M. Henderson*

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18 ANGEL CARRAZCO, JR.
19 KENT M. HENDERSON
20 CHRISTOPHER L. HOLM
21 Attorneys for Plaintiffs

DECLARATION OF KENT M. HENDERSON

I, Kent M. Henderson, do hereby declare and state as follows:

1. I am an attorney at law, duly licensed to practice before all courts of the State of California and the following Federal Courts: Supreme Court of the United States; United States Court of Appeals for the Ninth Circuit; United States Court of Appeals for the Fifth Circuit; United States Court of Federal Claims; United States District Court for the Northern, Eastern, Central and Southern Districts of California and the Eastern District of Texas. I am counsel with CARRAZCO LAW A.P.C. (hereinafter, sometimes referred to as "Carrazco Law"), counsel of record for the Salgado Plaintiffs, including WILLIAM OMAR CASTILLO MIRANDA; JUANA MARIA MIRANDA; O.C.E. a minor by and through their Guardian ad Litem, EUGENIA GUADELUPE ESPINOZA SALMERON; EUGENIA GUADELUPE ESPINOZA SALMERON, OSMAR ANTONIO CASTILLO BLANDON, and KARLA VANESSA BLANDON, in the above-entitled action. I am one of the handling attorneys regarding this case and the facts stated in this Declaration are of my own personal knowledge and/or I am informed and believe they are true and if called upon to testify as a witness, I could and would competently testify thereto under oath.

2. Attached hereto and labeled as Exhibit No. 1 is a true and correct copy of the personally served and "Received" stamped by Defendant City of Huntington Park Government Claim dated and stamped "May 1, 2023" and true and correct copies of the same Government Claim also with signed Proof of Service by U.S. Mail served May 1, 2023 and a copy of the postage stamped envelope also dated May 1, 2023.

3. Attached hereto and incorporated therein as part of Exhibit No. 1 is a true and correct copy of the Government Claim of Plaintiffs WILLIAM OMAR CASTILLO MIRANDA; JUANA MARIA MIRANDA; O.C.E. a minor by and through their Guardian ad Litem; EUGENIA GUADELUPE ESPINOZA

1 SALMERON, and OSMAR ANTONIO CASTILLO BLANDON dated May 1,
2 2023 and timely presented in person and by U.S. Mail. The attached Claim is
3 filed stamped "Received" by Defendant City of Huntington Park. Also included
4 therein is a true and correct copy of the mailing envelope which was postage
5 stamped May 1, 2023.

6 4. Attached hereto and labeled as Exhibit No. 2 is a true and correct
7 copy of relevant portions of the deposition of Plaintiff William Omar Castillo
8 Miranda which was taken on December 3, 2024.

9 5. Attached hereto and labeled as Exhibit No. 3 is a true and correct
10 copy of relevant portions of the deposition of Plaintiff Juana Maria Miranda which
11 was taken on January 9, 2025.

12 6. Attached hereto and labeled as Exhibit No. 4 is a true and correct
13 copy of relevant portions of the deposition of Plaintiff Eugenia Espinoza which
14 was taken on December 6, 2024.

15 7. Attached hereto and labeled as Exhibit No. 5 is a true and correct
16 copy of relevant portions of the deposition of Plaintiff Karla Vanessa Blandon
17 which was taken on January 9, 2025.

18 8. Attached hereto and labeled as Exhibit No. 6 is a true and correct
19 copy of relevant portions of the deposition of Plaintiff Osmar Antonio Castillo
20 Blandon which was taken on December 9, 2024.

21 9. Attached hereto and labeled as Exhibit No. 7 is a true and correct
22 copy of relevant portions of the deposition of Plaintiff, O.C.E., a Minor which was
23 taken on December 23, 2024.

24 10. Attached hereto and labeled as Exhibit No. 8 is a true and correct
25 copy of the deposition of Defendant Officer Rene A. Reza which was taken on
26 November 21, 2024.

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1 11. Attached hereto and labeled as Exhibit No. 9 is a true and correct
2 copy of relevant portions of the deposition of Defendant Officer Jose Yamasaki
3 which was taken on December 11, 2024.

4 12. Attached hereto and labeled as Exhibit No. 10 is a true and correct
5 copy of relevant portions of relevant portions of the deposition of Defendant
6 Officer Nick Nichols which was taken on November 18, 2024.

7 13. Attached hereto and labeled as Exhibit No. 11 is a true and correct
8 copy of relevant portions of the deposition of Defendant Officer Matthew Rincon
9 which was taken on November 20, 2024.

10 14. Attached hereto and labeled as Exhibit No. 12 is a true and correct
11 copy of relevant portions of the deposition of Defendant Lieutenant Saul
12 Rodriguez which was taken on December 10, 2024.

13 15. Attached hereto and labeled as Exhibit No. 13 is the Declaration of
14 Plaintiff William Omar Castillo Miranda which is dated March 11, 2025.

15 16. Attached hereto and labeled as Exhibit No. 14 is the Declaration of
16 Plaintiff Osmar Antonio Castillo Blandon which is dated March 11, 2025.

18 I declare under penalty of perjury under the laws of the State of California
19 and the United States of America that the foregoing is true and correct.

21 Executed this 11th Day of March, 2025 at Tustin, California.

23 */S/ Kent M. Henderson*

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25 Kent M. Henderson, Declarant
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